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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

14 Laura Leigh, and Wild Horse Education,  
 15 Plaintiffs,  
 16 v.  
 17 Interior Board of Land Appeals, United  
 18 States Department of Interior, Bureau of  
 19 Land Management, and KG Mining, Inc.,  
 20 Defendants.

21 Case No. 3:25-cv-00039-ART-CDS  
 22 **Stipulation and Order to Extend  
 23 Remaining Merits Briefs**  
 24 **(Third Request)**

25 Pursuant to FRCP 6(b)(1)(A), LR IA 6-1, and LR 26-3, Plaintiffs Laura Leigh and  
 26 Wild Horse Education (“Plaintiffs”), Defendant KG Mining (Bald Mountain) Inc. (“KG  
 27 Mining”), and Federal Defendant Interior Board of Land Appeals, United States  
 28 Department of Interior, Bureau of Land Management, through undersigned counsel,  
 hereby stipulate and agree as follows:

The current deadline for Federal Defendant to file its opposition/cross motion for  
 summary judgment is February 2, 2026. *See* ECF 53.

On January 26, 2025, respective counsel for Plaintiffs, Defendant KG Mining, and  
 Federal Defendant agreed to a seven (7) day extension of time for Federal Defendant to file  
 its opposition/cross-motion for summary judgment. The standard for extending time is  
 good cause. *See* FRCP 6(b)(1)(A).

1           Federal Defendant has good cause to request this brief extension of time. The  
 2 United States Attorney's Office for the District of Nevada has been operating at below fifty  
 3 percent capacity, and, since May of 2025, undersigned counsel has inherited numerous  
 4 additional defensive cases with their own competing deadlines. Additionally, this one-week  
 5 extension will allow the agency sufficient time to review the motion before the filing  
 6 deadline.

7           Accordingly, the parties, through undersigned counsel, submit this stipulation to a  
 8 7-day extension from February 2, 2026, to **February 9, 2026**, for Federal Defendant to file  
 9 their opposition/cross motion for summary judgment. This is Federal Defendants' third  
 10 request for an extension of time.

11           The parties agree that, pursuant to the Court's Revised Scheduling Order, (ECF No.  
 12 53), the deadline for KG Mining to file its opposition/cross-motion for summary judgment  
 13 will be extended correspondingly to **February 9, 2026**.

14           The remaining merits deadlines will also be postponed by seven days, resulting in  
 15 the following changes:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Federal Defendants and Defendant KG Mining will each file a combined opposition/motion for summary judgment, which can be up to 40 pages including tables and exhibits.	February 2, 2026	<b>February 9, 2026</b>
Plaintiffs will file either one combined opposition/reply in response to both Defendants' opening briefs, which can be up to 30 pages, including tables and exhibits, or in the alternative, Plaintiffs will file two combined oppositions/replies in response to each Defendant's opening brief, which can be up to 20 pages, including tables and exhibits.	March 2, 2026	<b>March 9, 2026</b>

1 Federal Defendants and 2 Defendant KG Mining, 3 Inc. will each file a reply, 4 respectively, which can be 5 up to 20 pages, including 6 tables and exhibits.	7 April 7, 2026	8 <b>April 14, 2026</b>
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9 This stipulated request is filed in good faith and not for the purposes of undue delay.

10 Federal Defendant confirms that this will be its final request to extend the deadline for their  
11 opposition/cross-motion for summary judgment.

12 Respectfully submitted this 27th day of January 2026.

13 GREENFIRE LAW, PC

14 /s/ Jessica L. Blome

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33 *Attorneys for Defendant KG  
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34 **IT IS SO ORDERED:**

35   
36 **UNITED STATES MAGISTRATE JUDGE**

37 **DATED:** February 2, 2026